

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JON HENSLEY,

PLAINTIFF,

v.

**MIDLAND CREDIT MANAGEMENT,
INC.**

DEFENDANT.

Case No. 22-cv-743

Hon. Elaine E. Bucklo

PLAINTIFF’S MOTION FOR ENTRY OF JUDGMENT ON OFFER OF JUDGMENT

NOW COMES Plaintiff Jon Hensley, by and through counsel, and for Plaintiff’s Motion for Entry of Judgment on Rule 68 Offer of Judgment states as follows:

1. This case was filed by Plaintiff against Defendant Midland Credit Management, Inc. for, *inter alia*, violation of the Fair Debt Collection Practices Act (“FDCPA”).
2. On June 16, 2022, Defendant transmitted to Plaintiff an offer to allow judgment to be entered against it and in favor of Plaintiff for \$1,001 in damages plus reasonable attorneys’ fees and costs. A copy of the Offer of Judgment was docketed as Dkt. # 17-1.
3. On June 27, 2022, Plaintiff accepted Defendant’s offer of judgment by filing a notice of acceptance of offer of judgment with this court. (Dkt. # 17).
4. Plaintiff respectfully requests that this court enter judgment in favor of Plaintiff for \$1,001 and either 1) allow the parties to confer regarding attorney’s fees and costs pursuant to Local Rule 54.3, or, 2) in the alternative, to direct Plaintiff to file a petition for attorney’s fees or costs within 21 days of entry of the judgment.

WHEREFORE, based on the foregoing, Plaintiff requests the Court to enter judgment in the amount of \$1,001 in favor of Plaintiff and against Defendant, require the parties to proceed according to local rule 54.3 or in the alternative, to direct Plaintiff to file a petition for attorney's fees or costs within 21 days of entry of the judgment, and for any other or further relief this Court deems just.

Dated: July 22, 2022

Respectfully submitted,

By: /s/ Bryan Paul Thompson
One of Plaintiff's Attorneys

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